

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COMMONWEALTH

v.

ADIANGEL PARADES
Defendant

CRIMINAL ACTION
NO. 19-40049-TSH

**DEFENDANT'S MOTION IN LIMINE TO EXCLUDE
COMMENTARY/INTERPRETATION OF RECORDINGS & TEXTS**

Now comes the Defendant in the above captioned matter and hereby requests that this Court prohibit any Government witness from commenting on, or testifying as to, their interpretation of the recordings and texts being offered by the Government in this case.


Specifically, but not limited to: On September 25th 2019, Defendant is alleged to have texted *Pablo Vidarte in Spanish wherein the message states; "No, you tell him, 'listen, listen, get me....get me that money.' You tell him, 'Hey, hey me that dough. Those people are asking."* It is speculation that the Defendant was speaking about getting him (the Defendant) the money, rather than providing advice such as "get me (me meaning Vidarte) that money," which would be advice, not conspiratory self-serving orders. Otherwise, no officer can testify to the meaning of the translation.

In support thereof, the Defendant states that any interpretation of said recordings would be pure speculation as none of the parties in the recordings are testifying in this case. Thus, any explanation provided by a Government agent as to the content of the conversations would be based solely on hearsay, creating the situation in which the Defendant will be denied the right to confront his accuser. United States v. Crawford, 581 F.2d 498.491 (5th Cir. 1978). Furthermore, it would be extremely prejudicial and naïve to suggest that any agent would be able separate his own experience as a narcotics agent, from the information he or she has been provided by the cooperating informant or other documents reviewed in this case. Thus, should the Court rule that any of the recordings in this case are admissible, the Defendant requests an order that no witness be permitted to provide their opinion and/or interpretation of said recording.

Boston, MA
10/6/2022

Respectfully submitted
By counsel for Adiangel Parades



STEFAN JOHN ROZEMBERSKY, Esq.
72 Orange Street, Suite 1A,
Providence, Rhode Island. 02903
617-877-7388 | Rozembersky.Esq@gmail.com
 www.RozemberskyLaw.com

CERTIFICATE OF SERVICE

This is to certify that the forgoing document, filed through the ECF system, has been served electronically on the registered participants identified on the Notice of Filing on the date of so noted on the notice on 10/6/2022

/s/ Stefan Rozembersky
Stefan Rozembersky